

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE NOVAGOLD RESOURCES INC.)	
SECURITIES LITIGATION)	MASTER FILE
)	
This Document Relates to:)	1:08-CV-7041 (DLC) (JCF)
)	
All Actions)	
)	

**NOTICE OF U.S. LEAD PLAINTIFF'S UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF PROPOSED CLASS SETTLEMENT**

PLEASE TAKE NOTICE that U.S. Lead Plaintiff, the New Orleans Employees' Retirement System, through counsel, hereby moves this Court before the Honorable Denise Cote for an order pursuant to Federal Rule of Civil Procedure 23(e) for preliminary approval of a proposed class action settlement, certification of a settlement class for settlement purposes only pursuant to Rule 23(a) and (b)(3), approval of the forms of notice, other matters related to issuing notice to the class and such other and further relief as the Court deems just and proper. Defendants will not oppose the motion.

PLEASE TAKE FURTHER NOTICE that in support of this motion, U.S. Lead Plaintiff submits and is submitting herewith: its opening brief; the accompanying April 1, 2010 Declaration of Joseph A Fonti with annexed exhibits; the Stipulation and Agreement of Settlement with annexed exhibits; and a proposed U.S. Preliminary Approval Order with annexed exhibits concerning notice to the proposed class.

Dated: April 6, 2010

Respectfully submitted,

LABATON SUCHAROW LLP

/s/ Joseph A. Fonti
Jonathan M. Plasse (JP 7515)
jplasse@labaton.com

Joseph A. Fonti (JF 3201)
jfonti@labaton.com
Nicole M. Zeiss (NZ 384)
nzeiss@labaton.com
140 Broadway
New York, NY 10005
Tel: (212) 907-0700
Fax: (212) 883-7044

*Counsel for Lead Plaintiff New Orleans
Employees' Retirement System and Lead
Counsel for the Class*